

EXHIBIT C

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Inc. and Certain of its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
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**LEHMAN BROTHERS HOLDINGS INC.'S OBJECTIONS
AND REBUTTAL DEPOSITION DESIGNATIONS TO THE
DEPOSITION DESIGNATIONS OF DR. THOMAS MARSONER**

Lehman Brothers Holdings Inc. ("LBHI") hereby makes the following objections and rebuttal deposition designations to the deposition testimony designated by Dr. Thomas Marsoner ("Marsoner") pursuant to paragraph 5 of the Stipulation and Order Establishing Pre-Trial Procedures in Connection with the Motion of Dr. Thomas Marsoner To Deem Proofs of Claim To Be Timely Filed by the Claims Bar Date, dated May 10, 2015 [ECF No. 52740].

Deposition Transcript of Dr. Thomas Marsoner

LBHI objects to all of Marsoner's designations of his own deposition testimony on the grounds that Marsoner is the claimant and he identified himself on his Witness List as a witness expected to testify live at the Evidentiary Hearing, and thus, his deposition testimony is inadmissible pursuant to Rule 32 of the Federal Rules of Civil Procedure ("FRCP") (made applicable by Rules 7032 and 9014(c) of the Federal Rules of Bankruptcy Procedure) and Rule 802 of the Federal Rules of Evidence ("FRE"). In the unlikely event that Marsoner does not appear at the Evidentiary Hearing, LBHI reserves the right to designate his deposition testimony at that time.

Deposition Transcript of Ruggero Magnoni

In addition to the specific objections identified below, LBHI objects to all of Marsoner's designations of Ruggero Magnoni's deposition testimony on the grounds that Marsoner identified Magnoni on his Witness List as a witness expected to testify live at the Evidentiary Hearing, and thus, his deposition testimony is inadmissible pursuant to Rule 32 of the Federal Rules of Civil Procedure ("FRCP") (made applicable by Rules 7032 and 9014(c) of the Federal Rules of Bankruptcy Procedure) and Rule 802 of the Federal Rules of Evidence ("FRE"). However, because Magnoni is a third party not under Marsoner's control, LBHI submits rebuttal designations to his testimony below.

Marsoner's Designations	LBHI's Objections	LBHI's Rebuttal Designations
23:23-24:2	FRCP 401, 403, and Partial/Incomplete Answer. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 105:12-106:15 and 109:15-110:2 of Peter Sherratt's deposition testimony in rebuttal.
25:4-12	FRCP 401, 403, and Partial/Incomplete Answer. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 105:12-106:15 and 109:15-110:2 of Peter Sherratt's deposition testimony in rebuttal.
28:9-31:4	FRCP 401, FRCP 403. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 105:12-106:15 and 109:15-110:2 of Peter Sherratt's deposition testimony in rebuttal.
32:20-33:4		33:5-9
56:13-57:7		

Deposition Transcript of Vittorio Pignatti		
Marsoner's Designations	LBHI's Objections	LBHI's Rebuttal Designations
10:12-21		
12:16-18	Partial/Incomplete Answer	
18:9-21	Partial/Incomplete Answer	18:22-24
26:17-28:14	FRCP 401, FRCP 403. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 30:4-11 of Pignatti's deposition testimony in rebuttal.
30:20-24	FRCP 401, FRCP 403, and Partial/Incomplete Answer. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 30:25-31:11 of Pignatti's deposition testimony in rebuttal.
62:1-63:12		
66:9-17		
66:24-67:1		
68:3-24		
86:15-21	Partial/Incomplete Answer	
Deposition Transcript of Peter Sherratt		
Marsoner's Designations	LBHI's Objections	LBHI's Rebuttal Designations
13:11-12	FRCP 401, FRCP 403. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary	In the event the Court accepts this testimony as evidence, LBHI designates 105:12-106:15 of Sherratt's deposition testimony in

	Hearing.	rebuttal.
46:1-4	FRCP 401	
48:16-17	FRCP 401, Partial/Incomplete Answer	48:19-49:8
109:16-22	FRCP 401, FRCP 403, and Partial/Incomplete Answer. This designation is relevant only to the merits of Marsoner's claim, which the Court will not be considering at the Evidentiary Hearing.	In the event the Court accepts this testimony as evidence, LBHI designates 109:15 and 109:23-110:2 of Sherratt's deposition testimony in rebuttal.
Deposition Transcript of Angharad Bowdler		
<u>Marsoner's Designations</u>	<u>LBHI's Objections</u>	<u>LBHI's Rebuttal Designations</u>
14:10-13	FRCP 32, FRE 802	16:2-17:6
17:7-25	FRCP 32, FRE 802	16:2-17:6
18:9-19:23	FRCP 32, FRE 802	16:2-17:6
Deposition Transcript of Steven Kotarba		
LBHI objects to all of Marsoner's designations of Steven Kotarba's deposition testimony on the grounds that LBHI identified Kotarba on its Witness List as a witness who will testify live at the Evidentiary Hearing, and thus, his deposition testimony is inadmissible pursuant to Rule 32 of the Federal Rules of Civil Procedure (" <u>FRCP</u> ") (made applicable by Rules 7032 and 9014(c) of the Federal Rules of Bankruptcy Procedure) and Rule 802 of the Federal Rules of Evidence (" <u>FRE</u> ").		
Deposition Transcript of Thomas Behnke		
LBHI objects to all of Marsoner's designations of Thomas Behnke's deposition testimony on the grounds that LBHI identified Behnke on its Witness List as a witness who will testify live at the Evidentiary Hearing, and thus, his deposition testimony is inadmissible pursuant to Rule 32 of the Federal Rules of Civil Procedure (" <u>FRCP</u> ") (made applicable by Rules 7032 and 9014(c) of the Federal Rules of Bankruptcy Procedure) and Rule 802 of the Federal Rules of Evidence (" <u>FRE</u> ").		

Dated: June 29, 2016
New York, New York

/s/ David J. Lender

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